

Safety Management Performance Assessment 2019

ISMS Final Report



June 2019

INTENTIONALLY LEFT BLANK



Ian Holder, MD

Introduction to Baines Simmons

Renowned for our professional expertise, practical skills and industry experience in aviation regulations, compliance and safety management, Baines Simmons has become recognised as one of the world's most influential aviation consultancies in organisational safety performance.

All our services are designed to:

- **Improve:** Safety performance, organisational performance and operational capability
- **Protect:** Lives, assets, profitability and reputation
- **Reduce:** Risk, rework, error, inefficiency and incidents

We have partnered with more than 750 aviation organisations and 40 Aviation Authorities around the world and led a comprehensive range of regulatory, compliance and safety improvement programmes which have developed the skills and expertise of more than 120,000 aviation professionals across all sectors of the industry.

Consummate professionals with a passion for aviation safety, our expertise and practical approach is used to guide, influence and improve the safety performance of civil and defence aviation organisations around the globe.

- Our training courses achieve 100% satisfaction for customer service and course content
- Our consulting services attract endorsements and approval from the world's top aviation companies
- Our outsourced services are praised for their high standards of customer-focussed service, professional independence and cost efficiencies

Through our bespoke consultancy programmes and practically-focussed training services, we help to bridge gaps of knowledge, competence, skills and understanding between regulated organisations and their employees and regulatory authorities and their inspectors.

Every one of our consultants is hand-picked for their specialist skills, expertise and knowledge in a particular field of aviation safety risk management and regulatory compliance. Through them, we deliver customised solutions that are designed to reduce your exposure to safety risk, enhance organisational safety and manage and improve regulatory compliance.

Project Management

Project Client	ISMS Schiphol – Safety Manager
Project Title	Safety Management Performance Audit
Baines Simmons Programme Manager	Stephen Hough
Audit Team	Simon Miles
Baines Simmons Governance	Ross Priday
Version	Final Report
Issue Date	21 st June 2019

Acknowledgements

The Baines Simmons project team would like to thank all staff involved within the ISMS for their time and generous contribution to this Safety Management Performance Audit. Their willingness, openness and candour have enabled us to build a strong understanding and offer an evaluation of the current Safety Management performance within the organisation. In particular, our thanks go to Stephanie Poeliejoe Zewald who graciously made all the appointments for the audit and looked after the Baines Simmons team whilst on-site.

Copyright

The report resulting from Baines Simmons Ltd services to Schiphol Nederland BV (SNBV) may be used by SNBV and shall not be used by the Supplier, provided that each Party shall remain the owner of any of its intellectual property rights. For the avoidance of doubt any Intellectual Property of the Supplier used to produce the report, such as the methodology and processes adopted by the Supplier to produce the report, remain the Supplier's and shall not vest in SNBV.

The Other Party shall refrain from the use, in any form of publication or otherwise, of the name SNBV, the brand name of Amsterdam Airport Schiphol, Schiphol Group or any other intellectual property right belonging to, or in use by, SNBV or Royal Schiphol Group N.V., without SNBV's prior permission in writing. The Other Party shall refrain from taking photographs, making recordings or using other media, and from using visual material on which Amsterdam Airport Schiphol or parts thereof are visible.

The Client shall be permitted to reproduce or utilise any part of this work for its own internal use. All requests for permission to use copyright material, other than as stated above, shall be made in writing in the first instance to Baines Simmons Ltd, Aviation Safety Centre, Building A5, Fair Oaks Airport, Chobham, Surrey GU24 8HU.

Disclaimer

Baines Simmons makes all reasonable efforts to ensure an accurate understanding of client requirements. The information in this report is based on that understanding.

Baines Simmons has prepared this report for the use of the Client and for the intended purposes as stated in the agreement between the Client and Baines Simmons, under which this work was completed. That agreement takes precedent over the summary here.

The Parties shall, vis-à-vis third parties, guarantee secrecy with respect to any business information, including business resources, business operations, computer software and other data originating from SNBV, which, in any way whatsoever, came, or was brought to its attention.

The Parties shall not multiply, or disclose to third parties any information relating to the Agreement other than is necessary within the framework of the performance of the Agreement, and only after written permission from SNBV.

All aids and documents made available by SNBV to the Other Party within the framework of the Agreement, as well as any other business information, shall at all times remain the property of SNBV, and be returned at SNBV's first request to that effect, or not later than on delivery.

The Parties shall refrain from providing third parties with information relating to SNBV or any of its activities and, in particular, relating to the contents of the Agreement. This obligation to refrain from disclosing information shall apply especially, and in particular, to the provision of information to the media, also including social media

Neither party is entitled to transfer the rights and obligations arising from the Agreement to a third party without written permission from the other party. Such permission shall not be refused without reasonable grounds; the party that grants permission is, however, entitled to attach conditions to its permission.

Baines Simmons has exercised due and customary care in conducting this work, but has not, save as specifically stated, independently verified information provided by others. No other warranty, express or implied is made in relation to the conduct of the work or the contents of this report. Therefore, Baines Simmons assumes no liability for any loss resulting from errors, omissions, or misrepresentations made by others. No warranty or representation of accuracy or reliability in respect of the report is given by Baines Simmons, its directors, employees, servants, agents, or consultants.

This disclaimer shall apply to liability to any person whatsoever, irrespective of how such liability arises. Baines Simmons is not responsible in any way whatsoever for the error, neglect or default of others upon whom it has placed reliance in the preparation of this report.

This report has been prepared for the purpose of the stated client requirement.

Any recommendations, opinions or findings stated in this report are based on circumstances and facts as they existed at the time Baines Simmons performed the work. Any subsequent changes in such circumstances and facts upon which this report is based may adversely affect any recommendations, opinions and findings contained in this report.

Contents

A. Executive Summary	9
A.1 Environmental Factor (Context)	9
A.2 Assessment.....	9
B. Objective and Scope.....	19
B.1 Background.....	19
B.2 Scope.....	19
B.3 Objective.....	19
B.4 Task Breakdown	19
B.5 Deliverables	20
C. Definitions and Methodology – EASA Management System Assessment Tool (MSAT).....	21
C.1 Introduction	21
C.2 How and when the tool is used.....	21
C.3 Credit for other oversight activities	22
C.4 Dealing with multiple certificate holders	22
C.5 Tool guidance.....	23
C.6 Applicability	23
C.7 Definitions used in the tool.....	24
C.8 Level of detail to be recorded.....	24
C.9 Addressing findings and observations.....	25
I. Safety Policy and Objectives.....	26
I.1 Management Commitment.....	26
I.2 Safety Accountability and Responsibilities	32
I.3 Appointment of Key Personnel.....	35
I.4 Emergency Response - not in scope of Performance Audit.....	36
I.5 SMS Documentation	37
2. Safety Risk Management.....	39
2.1 Hazard Identification	39
2.2 Risk Assessment and Mitigation	41
3. Safety Assurance	43
3.1 Safety Performance Monitoring and Measurement	43
3.2 The Management of Change	45
3.3 Continuous Improvement of the SMS.....	46
4. Safety Promotion	47
4.1 Training and Education	47
4.2 Safety Communication.....	49
5. Additional Items to be Considered	50
5.1 Interface Management	50
5.2 Responsibilities for Compliance and Compliance Monitoring Function.....	51
D. Recommendations.....	55

INTENTIONALLY LEFT BLANK

A. Executive Summary

This section outlines the environmental factors, key themes and overall assessment criteria.

A.1 Environmental Factor (Context)

Every organisation is susceptible to its own set of unique external influences and, when assessing an organisation’s maturity, it is imperative that relevant business and environmental factors are understood, as these factors may have an impact on diagnostic results.

Whilst Schiphol Integral Safety Management System (ISMS) is not a regulated entity, the organisation exists to enhance safety across the interfaces of the partners and is mandated by government covenant as part of the State Safety Programme. The ISMS has been in place for just over 1 Year and during this period has concentrated on developing and implementing the Management System. The ISMS project was initiated on the own initiative of the sector parties as the past safety coordination meeting structure was insufficiently effective. The Dutch Safety Board (OVV) also raised a report into The Safety of Air Traffic at Schiphol (APR 2017) where concerns required addressing. The ISMS is an organisation that consists of the sector partners and is governed by their Accountable Executives jointly. This has contributed to the results and key themes below:

A.2 Assessment

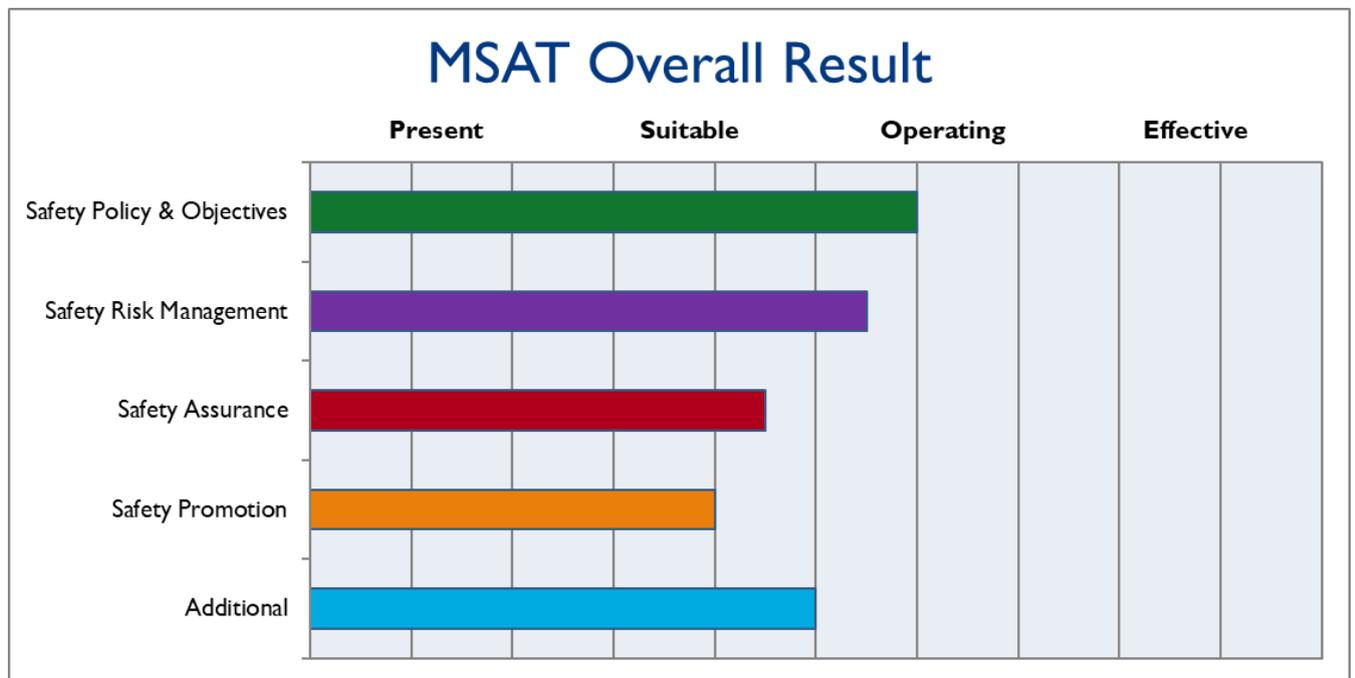
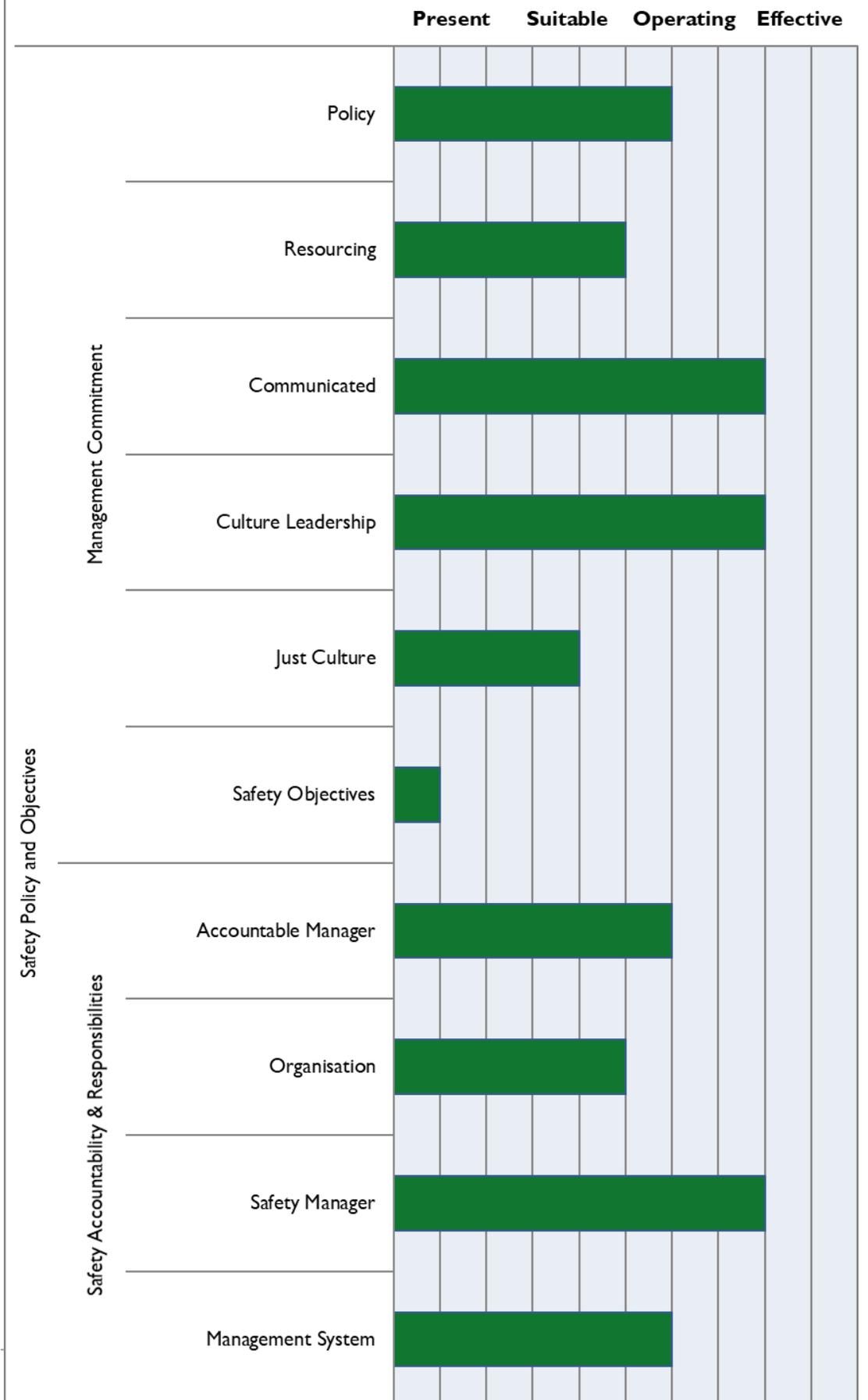


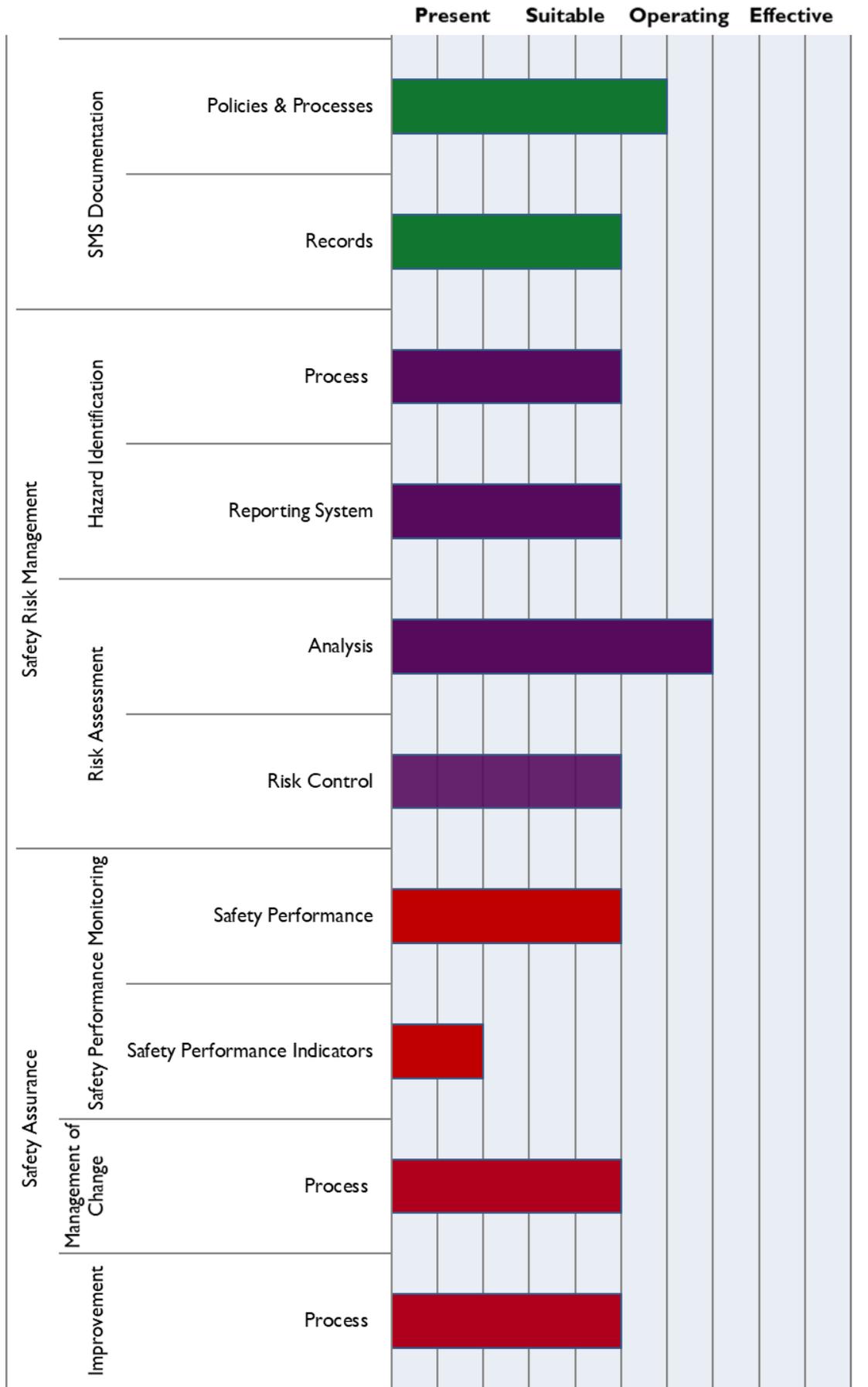
Figure 1: Overall Assessment

Assessment - The overall performance of the management of safety within the ISMS, measured against PRESENT, SUITABLE, OPERATING, EFFECTIVE, as defined by the EASA Management System Assessment Tool (MSAT), is currently assessed as being at OPERATING, which is above the global aviation industry average of high SUITABLE, assessed by Baines Simmons with 22 assessments completed within the last 3 years. In the view of Baines Simmons, the current regulatory requirement (based on EASA Organisational General regulation) is at OPERATING; however, few regulators are yet mature enough in their Performance Based Oversight programmes to assess this accurately. Given the short amount of time that the ISMS has been in place to achieve an assessment of OPERATING already is remarkable and furthermore, there are already some EFFECTIVE indicators in the ISMS which shows promise for the future development.

Assessment Breakdown – On the next page is a breakdown of the assessment by the MSAT Pillars and Sections:

MSAT Results Overview





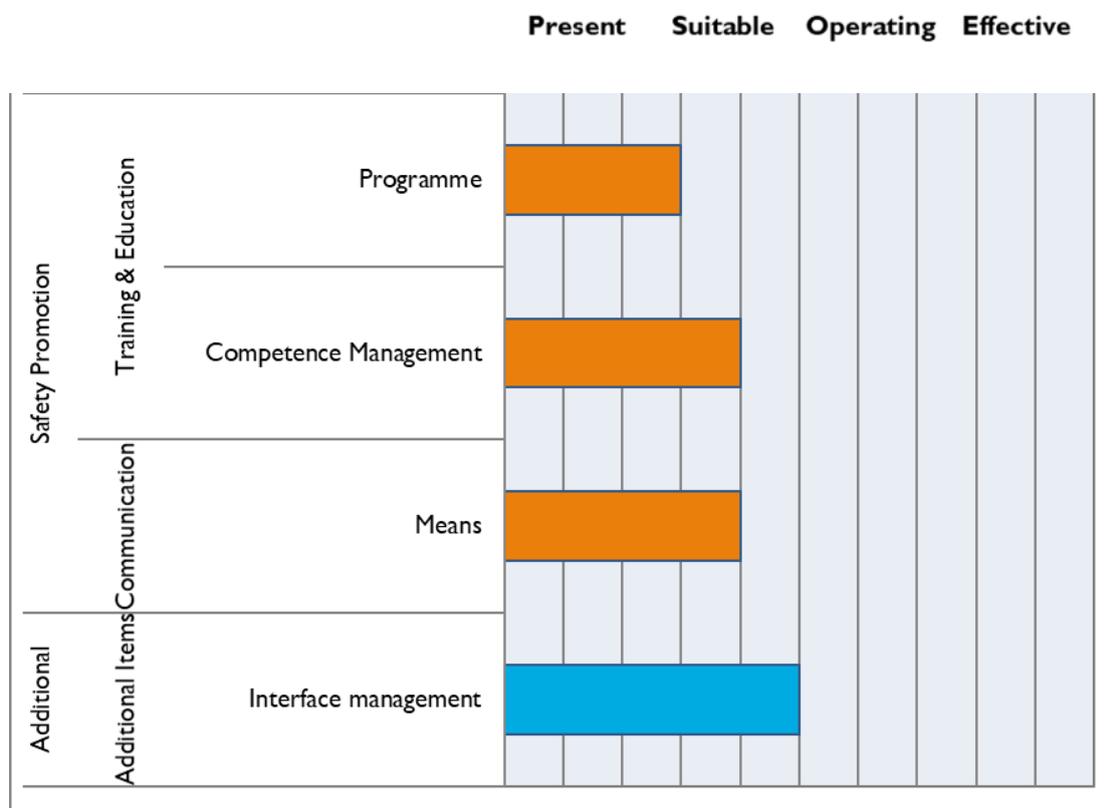


Figure 2: MSAT Results Overview Chart

Key Themes. A more detailed set of conclusions for each component can be found in Sections 1 to 5; however, a few key themes, both positive and those that are holding back the management system from moving to EFFECTIVE, are highlighted here:

▶ **Safety Policy and Objectives**

The Safety Policy is very well documented and there is clear understanding and endorsement of the policy by the accountable executives. The policy and procedures set a very firm foundation as to how the ISMS will perform and this is well established. Notwithstanding these foundations, there are currently no Safety Objectives set, though these are planned. With a maturing system providing more output and Objectives in place an EFFECTIVE system is achievable.

▶ **Safety Risk Management**

The use of the Risk Assessment Workshop, involving subject matter experts and data from the National Aerospace Laboratory (NLR), is an innovative and appropriate way to assess risk across the partner interfaces, providing insight to the Top Safety Action Group and Safety Review Boards who have the accountability to mitigate those risks to an acceptable level. The focus on Top 5 Risks for Flight and Ground and the workplan to improve on these

is appropriate during the initial phases of the ISMS. There is evidence of good risk assessment activity, including risks from the management of change process. Overall the maturity level of the system (first stages of meaningful output) at this moment is holding back the assessment from EFFECTIVE.

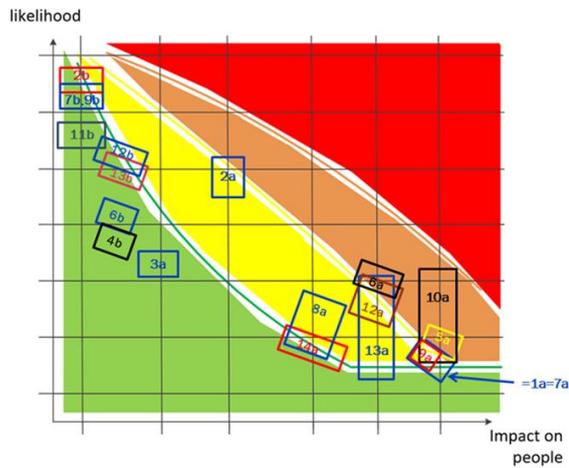


Figure 3: ISMS Common Risk Matrix, box size demonstrating risk variation across the partners.

► Safety Assurance

There is some monitoring of safety performance, but the metrics in use are mostly lagging indicators and indicate little about the current performance of the management system. Furthermore, whilst there is a process in place to measure the effectiveness of risk controls, in reality, this is mostly based on expert judgement together with data available from the SMS of the participating organisations, which can be subjective and there is little real evidence to ensure that identified risks are actually being controlled and monitored against a pre-determined level of performance. The planned implementation of Safety Performance Indicators set against Safety Objectives will provide this required measure of effectiveness and potentially with the use of leading SPIs enable a more proactive approach. The ISMS has now started to provide output and a Safety Assurance process can be initiated upon this output.

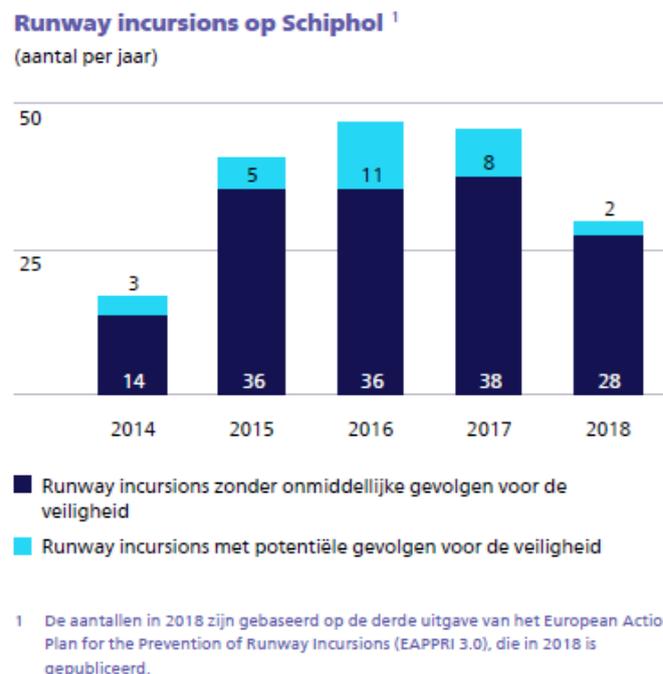


Figure 4: Example of graph from current Safety Performance Indicators demonstrating reduction in Runway Incursion events

► Safety Promotion

The individual partners each have their own training programmes and there are clear Skills and Qualities required of the ISMS team members defined to ensure that competent staff are involved. There is currently no safety training programme for the Integral Safety Office staff but this is planned. The ISMS is a support function to the individual partners in providing information that can be used for Safety Promotion and is not intended to supersede these but enhance them. The very existence of the ISMS also promotes safety and sharing of best practice across the partners and benefits everyone who operates at Schiphol.

▶ **Additional Items to be considered**

○ **Interface Management**

The main reason for ISMS is to manage the interfaces between the partners and it is an ideal organisation set up to achieve this. The interface with ABL can be a mutually beneficial one, with the sharing of ISMS' knowledge and competence improving ABL's understanding of what output is required and ISMS being able to use that output to proactively measure and benchmark risk mitigations and identify hazards.

○ **Compliance Monitoring**

As there is no regulation that the ISMS is required to meet, there is nothing for them to be compliant to, rendering compliance monitoring not applicable. This Performance Assessment is in part a form of compliance against the ISMS' own procedures and their appropriateness but an internal compliance monitoring programme is not currently in place to assure that the ISMS complies with its own manual.

▶ **Schiphol Safety Improvement Covenant Questions**

In answer to the questions within the covenant and with reference to the performance assessment conducted it can be said:

That to which degree does the ISMS operate towards established procedures is assessed at OPERATING level, in that the ISMS is following its established procedures and has a well documented and structured Safety Management System.

To which degree is safety demonstrably increased by sound cooperation between sector parties is assessed at a SUITABLE level in that the Safety Management System is still developing but has started to show some output and a safety increase (For example Runway Incursion reduction, QQ Taxiway risk assessment). Given time to produce more output this is likely to be shortly at OPERATING.

To which degree that ISMS elements described in Article 6 (of the Covenant) are operating is assessed at OPERATING in that there is evidence of output in the stipulated areas:

- There is the management of safety risk across interfaces.
- That there is an SMS set up on the ICAO and EU guidelines (With scope for development within the Safety Assurance area).
- Joint Incident Investigations have taken place, a risk management methodology has been established, there is control of risk but the check of effectiveness is in its infancy due to the relatively short existence of the ISMS.
- Decisions have been made to ensure timely implementation of safety measures but again there are only few due to the relatively short existence of the ISMS.

- There is a joint strategic approach to safety and safety targets are due to be set shortly now there is some output.

To which degree are ISMS results described in Article 7 (of the Covenant) realised is assessed as EFFECTIVE as the deadlines have been achieved. There are Joint Risk analysis, Joint Investigations, Five primary Risks determined in both the Flight Operations and Ground Handling environments and a handbook established.

▶ Overall

For the ISMS to achieve an assessment score of OPERATING, which is above the aviation industry average, in such a short space of time from its initiation is very impressive and bodes well for the planned development and progression. The success achieved so far can be attributed to the enabling factors around the four pillars of Safety Management that were assessed here.

Although the enabling factors were not specifically in the scope of the assessment they are key to its current performance and some are worthy of specific mention:

- Active leadership

The Accountable Executives of the partner organisations have demonstrated full commitment to the implementation of the ISMS. It is this drive, support and very visible endorsement that has been instrumental to the rapid progress so far.

- Proactive Culture

There is a strong, proactive and pragmatic culture with safety at the core of how business is done at Schiphol which meant that once the ISMS was initiated it could rapidly take hold.

- Managed Competence

Those involved with the ISMS are very competent individuals and teams, especially regarding safety. An operating training programme would further enhance skills and knowledge.

- Supportive Capability

A robust and well considered structure has been developed for the ISMS which has again aided the implementation. The ISMS is well resourced and with the support of external agencies such as the NLR and MovingDot gives the ISMS every opportunity to provide credible safety improvement to the aviation sector within Schiphol.

The project to place a Safety Management System on top of the regulated individual Management Systems to fully exploit the maximum safety benefit from the interfaces, which are

often overlooked or poorly managed, can be considered industry leading and has great potential for the improvement of safety. It is a model that is currently best practice and an example of how airports and the aviation partners within can work together.

The ISMS can be considered established in place and now needs to move into a consolidation phase where more output is produced. This output should be used to consider how safety assurance can be achieved by the posing of Key Performance Questions, the setting of safety objectives and then measuring of safety performance against these. As stated, all the enablers are in place for the ISMS to continue to progress and fulfil the intent of the Covenant.

B. Objective and Scope

B.1 Background

The Schiphol Integral Safety Management System have engaged Baines Simmons to conduct a Performance Audit (PA) utilising the EASA Management System Assessment tool (MSAT).

B.2 Scope

Partner	Location
ISMS ISO	AMS
KLM	AMS
LVNL	AMS
RSG	AMS
Representative Airline	AMS
Representative Refuelling	AMS
Representative Ground Handling	Unavailable during assessment week

The scope of the PA is defined by the Partners as identified above and the topic areas identified in the MSAT. We have used our professional consulting techniques to gather facts and findings on which we have formed conclusions and where appropriate high-level recommendations. Our approach of considering the human-in-the-system during the PA addresses the resultant behavioural markers of staff, to arrive at a considered opinion of the management system performance.

B.3 Objective

The objective of the PA is to provide Schiphol ISMS with a formal, independent and unbiased confirmation of the level of management system performance that includes:

- ▶ A review of how effective the work done by the ISMS to date has been in building its management systems
- ▶ Assessing the extent of any gaps against the ISMS desired status of EFFECTIVE on the PSOE scale.

B.4 Task Breakdown

- ▶ **Planning Stage:** The Principal Consultant nominated as Project Manager conducted a project team launch meeting and orientation; scoping, planning and initiation.
- ▶ **On-site phase.** Information was captured and documented from one-to-one interviews and focus groups. This involved staff at all levels and any relevant stakeholders to provide a robust assessment of the partners in scope.

- ▶ **Analysis.** Comments, evidence and observations collected throughout our engagement were captured as facts (confirmed using cross checking techniques), plotted against the evaluation criteria below and subsequently grouped in order to develop findings and conclusions.
- ▶ **Report Writing Phase:** This report details the findings and conclusions, including an Executive Summary and industry benchmarking.
- ▶ **Report Presentation:** The report will be delivered by the Baines Simmons Project Manager to the Guidance Committee.

B.5 Deliverables

The key deliverables are:

- ▶ A report with key results including:
 - An assessment of the constituent parts of the ISMS against the EASA MSAT and PSOE performance markers
- ▶ Report presentation to the ISMS Guidance Committee summarising the conclusions.
 - Follow up meeting 2-3 weeks later to discuss the conclusions.

C. Definitions and Methodology – EASA Management System Assessment Tool (MSAT)

C.1 Introduction

Note: *The following information is primarily extracted from the EASA Management System Assessment Tool (MSAT) ver 1.0 as intended for guidance to regulators. Baines Simmons have applied our QIEJ (Question, Indicators, Evidence and Judgement) assessment methodology to the Key Performance Questions (KPQs) of the MSAT.*

ICAO Annex 19 promotes a common approach to safety management and safety oversight across aviation domains. This document provides a common assessment methodology focusing both on assessment and continual improvement of the Management System/SMS within the scope of authority oversight.

A common approach to assessing Management System/SMS effectiveness supports competent authorities to evolve from traditional, compliance-based oversight to performance-based oversight, provides a common baseline for Management System/SMS effectiveness assessment and creates a sound basis for mutual acceptance of SMS under bilateral agreements.

The assessment tool is designed to be used by competent authorities but it could also be used by organisations, to assess the effectiveness of their own Management System/SMS, for the purpose of continuous improvement. The resulting assessment could be discussed with the competent authority, in order to obtain a common understanding of Management System/SMS effectiveness. Organisations could also use the tool to assess the Management System/SMS of subcontract organisations.

C.2 How and when the tool is used

This Management System assessment tool may be used for both initial certification (initial implementation of the Management System/SMS) and continuing oversight. In this case the tool is used to understand the maturity of the management system at this moment, which can then be revisited to assess progress and development.

C.2.1 Initial certification/implementation

Before issuing the certificate, the competent authority should make sure that all processes are PRESENT and SUITABLE, so that all the required enablers of a functioning SMS are implemented by the organisation. In this initial certification phase, a large part of the SMS assessment could be carried out by a desktop review of relevant Management System/SMS Documentation. However, carrying

this out at the organisation provides an opportunity for the inspector to advise and guide the organisation on its Management System/SMS implementation and support standardised implementation.

C.2.2 Continuing oversight

After initial implementation, the organisation should start using the Management System/SMS as part of its operations. The competent authority should ensure that within the first oversight planning cycle the organisation's Management System/SMS processes are PRESENT, SUITABLE and OPERATING. An organisation may eventually have EFFECTIVE processes, which is the evidence of an EFFECTIVE SMS. In order to check that SMS processes are indeed OPERATING and/or EFFECTIVE the Management System/SMS should be re-evaluated on a regular basis to assess how well it is performing. The review should assess all of the items in the assessment tool which can be done by a combination of organisational visits, meetings and desk top reviews.

As an organisation's Management System/SMS processes mature and it moves to OPERATING and EFFECTIVE this may also require the 'suitability' criteria to be revisited. Changes to an organisation's approval may also require a reconsideration of the suitability of the SMS processes. So when significant changes take place the competent authority may determine the need to review the existing assessment to ensure it is still appropriate.

C.3 Credit for other oversight activities

Valuable information about Management System/SMS effectiveness can be gained from other oversight activities. This may include such activities as routine compliance audits and inspections, occurrence investigations and meetings with the organisation. This should be taken into consideration by the inspector through liaison with other inspectors involved in the oversight of the organisation. Competent Authorities may also consider giving credit where an organisation has received accreditation for meeting an industry standard.

C.4 Dealing with multiple certificate holders

In the case of an organisation holding multiple approval certificates, the use of the Management System/SMS assessment tool should follow the rule "1 Management System/SMS = 1 assessment". Therefore, if one organisation integrates all certificates within a single Management System/SMS, the assessment should consider the Management System/SMS as a whole.

Yet, it may be the case that different teams of inspectors oversee the same Management System/SMS with regard to different certificates, and a single assessment may be impracticable. In such case, the different assessments should be shared with the various teams of inspectors, and a common message coming from the competent authority(ies) should be provided.

C.5 Tool guidance

The tool assesses the compliance and effectiveness of the Management System/SMS through a series of features based on ICAO Annex 19 Second Edition and EASA Management System requirements for organisations. It is set out using the 12 elements of the ICAO SMS Framework and some additional EASA Management System requirements. Each feature should be reviewed to determine whether the feature is PRESENT, SUITABLE and OPERATING and EFFECTIVE, using the definitions and guidance set out below.

The tool is used by the competent authority inspector to evaluate and record the assessment. Alternatively it can be partially completed by the organisation to assess itself and by the competent authority to verify and validate the organisation's assessment.

C.6 Applicability

The assessment tool can be used to assess any size of organisation. However, due consideration should be given to the size, nature and complexity of an organisation to assess whether the individual feature of the SMS is SUITABLE. Inspectors should refer to any existing EASA regulations that define what the management system/SMS may look like for non-complex organisations when considering if a feature is SUITABLE. The competent authority should also consider any applicable Alternative Means of Compliance as part of the Management System/SMS assessment.

The tool has been designed to capture the generic Management System/SMS requirements. As currently there are no common EASA Management System/SMS requirements there may be some additional sector specific requirements that may need to be considered as part of the assessment.

C.7 Definitions used in the tool

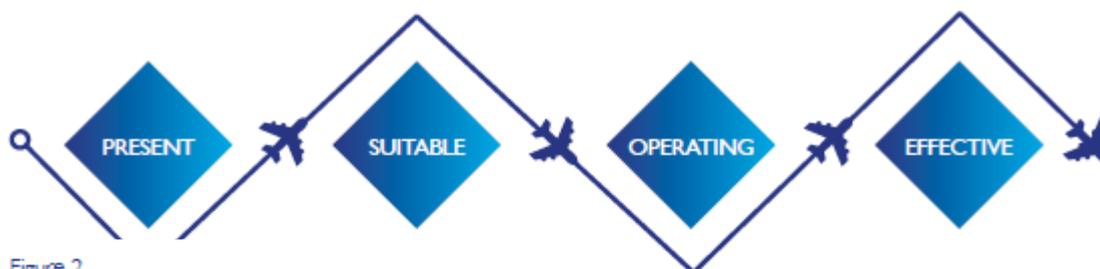


Figure 2

Present (P):	Evidence that the 'indicator' is clearly visible and is documented
Suitable (S):	Evidence that it is suitable based on the size, nature, complexity of the organisation
Operating (O):	Evidence that the indicator is in use and a clear output is being produced
Effective (E):	Evidence that the indicator is effective and achieving the desired outcome

Figure: 5 PSOE Definitions

For PRESENT, OPERATING and EFFECTIVE a 'word picture' is included to help the inspector determine the correct level. There is no word picture for SUITABLE as this is specific to the individual organisation and impossible to define for all types and sizes of organisations. It is the responsibility of the organisation to determine the suitability and to justify to the competent authority who will then assess it.

The PSOE level should be considered as progressive; it must first be PRESENT, then confirmed as SUITABLE, then it becomes OPERATING and may then be EFFECTIVE. During ongoing assessments the suitability should be reassessed taking into account changes to the organisation and its activities.

An item cannot be considered EFFECTIVE if it is not PRESENT because if it is not documented it cannot be carried out consistently and systematically.

C.8 Level of detail to be recorded

It is important that the inspector using the assessment tool records evidence of the assessment. Evidence includes documentation, reports, records of interviews and discussions. For example, for an item to be PRESENT the evidence is likely to be documented only, whereas for assessing whether it is OPERATING it may involve assessing records as well as face to face discussions with personnel within an organisation.

C.9 Addressing findings and observations

The current findings definitions used in EU regulations are not consistent across domains and do not necessarily fit the Management System/SMS assessment which requires more focus on the effectiveness of the processes. Observations should be used to identify areas for continuous improvement and encourage a positive safety culture.

For the initial certification or as part of a transition to new Management System/SMS requirements for existing certificate holders all the processes should be PRESENT and SUITABLE. If any are not then the approval should not be granted or transition accepted. Once a Management System/SMS is OPERATING and transition periods expired, during the assessment if a process is found not to be OPERATING, a finding should be raised.

Where a feature is found not to be effective the inspectors may consider issuing an observation to give rise to suggested improvements. However, findings should not be issued if the process is OPERATING but not EFFECTIVE.

The completed assessment tool with the competent authority remarks from the assessment or at least a summary of the Management System/SMS assessment should be provided to the organisation along with a report that captures any findings and observations. Providing the organisation with detailed comments of the assessment will assist in continuous improvement of the Management System/SMS and supports a positive safety culture at a State level.

I. Safety Policy and Objectives

I.1 Management Commitment

Annex 19 reference & text				
1.1.1 The service provider shall define its safety policy in accordance with international and national requirements. The safety policy shall:				
e) be signed by the accountable executive of the organization				
g) be periodically reviewed to ensure it remains relevant and appropriate to the service provider				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
There is a safety policy that includes a commitment to continuous improvement, observe all applicable legal requirements, standards and considers best practice signed by the accountable manager.		It is reviewed periodically to ensure it remains relevant to the organisation.	The accountable manager is familiar with the contents of the safety policy.	
Verification Examples				
<ul style="list-style-type: none"> The Safety Policy is documented within the ISMS Manual, current version 2.0 The document is its first year of use and periodically reviewed by the core team as to suitability. Evidence that approval of policy and manual discussed at SRB. The policy is not signed as the ISMS is a joint organisation but all SRB members (accountable for their own organisations) are familiar with the contents. The Schiphol Safety Improvement Covenant also commits the organisation to continuous improvement. 				
Conclusion				
The policy meets best practice standards and is suitable in the context of the joint nature of the ISMS. There has been one update to the manual. The assessment of low OPERATING is due to the relatively short time the organisation has been in operation and at the next assessment evidence of further periodic review would demonstrate improvement.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Org.
ORO.GEN.200 'Management system' point (a)(2) and (a)(6) AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators] AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	ORA.GEN.200 'Management system' point (a)(2) and (a)(6) AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex organisations] AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005 'Management system' point (b)(2)	ATS.OR.200 'Safety management system' Point (1) AMC1 ATS.OR.200(1)(i) Safety management system SAFETY POLICY — COMPLEX ATS PROVIDERS AMC1 ATS.OR.200(1); (2); (3) Safety management system GENERAL [non-complex ATS providers]	ATCO.OR.C.001 'Management system of training organisations' point (b) AMC1 ATCO.OR.C.001(b) Management system of training organisations SAFETY POLICY

Annex 19 reference & text

1.1.2 The safety policy shall

b) include a clear statement about the provision of the necessary resources for the implementation of the safety policy

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The safety policy includes a statement to provide appropriate resources.		The organisation is assessing the resources being provided to deliver a safe service and taking action to address any shortfalls.	The organisation is reviewing and taking action to address any forecasted shortfalls in resources.

Verification Examples

- ISMS Integral Safety Organisation is well resourced with competent persons.
- The SRB has responsibility of providing suitable resource as per the ISMS manual.
- The SRB members interviewed understood their resource commitment.
- The Schiphol Safety Improvement Covenant also demonstrates commitment to improvement.
- Evidence from SRB minutes of meeting that resource discussed on agenda.

Conclusion

The Safety Review Board members understand and demonstrate their commitment of resource to the ISMS.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators]	AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex organisations]	AMC1 ADR.OR. D.005 'Management system' point (b)(2)	ATS.OR.200 'Safety management system' Point (1)	ATCO.OR.C.001 'Management system of training organisations' point (b)
AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]		and related AMC/GM	and related AMC/GM

Annex 19 reference & text

1.1.3 The safety policy shall

f) be communicated, with visible endorsement, throughout the organization See

2.1.2 for c) include safety reporting procedures

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a means in place for the communication of the safety policy.		The safety policy is communicated to all personnel (including relevant contract staff and organisations).	People across the organisation are familiar with the policy and can describe their obligations in respect of the safety policy

Verification Examples

- Policy well understood by all interviewees.
- SRB members could fully and freely describe their obligations in respect to both the safety policy and Schiphol Safety Improvement Covenant.
- Policy within ISMS manual, little external communication but in context of the joint nature of the ISMS not needed. Fully known by those that need to know but not necessary to communicate across all staff within all organisations as could confuse with own safety policy.

Conclusion

The policy was well understood and very clearly endorsed at all levels, especially by Senior Management within the SRB.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators] Point (a)(3) Not addressed for non-complex operators	AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex operators] Point (a)(3) Not addressed for non-complex organisations	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005(b)(2) 'Management system' point (a)(4)	ATS.OR.200 'Safety management system' (1)(i) AMC1 ATS.OR.200(1)(i) 'Safety management system' SAFETY POLICY — [complex ATS providers] AMC1 ATS.OR.200(1); (2); (3) Safety management system GENERAL [non-complex ATS providers]	AMC1 ATCO.OR.C.001(b) 'Management system of training organisations' point (d)

Annex 19 reference & text

1.1.4 The safety policy shall

a) reflect organizational commitment regarding safety, including the promotion of a positive safety culture

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The management commitment to safety is documented within the safety policy.		The accountable manager and the senior management team are promoting their commitment to the safety policy through active and visible participation in the safety management system.	Decision making, actions and behaviours reflect a positive safety culture and there is good safety leadership that demonstrates commitment to the safety policy.

Verification Examples

- Good Accountable Executive attendance at SRB (no substitute policy).
- Accountable Executives are able to articulate policy, especially just Culture elements.
- Accountable Executives clearly committed.
- Positive attitude towards safety and the ISMS by all interviewees.

Conclusion

Safety and risk based decision making is high on the agenda of the Executive and this is recognised and reflected by the staff.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' point (a)(2) - [complex operators]	AMC1 ORA.GEN.200(a)(2) 'Management system' point (a)(2) - [complex organisations]	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005 'Management system' point (a)(3)	ATM/ANS.OR.B.015(a)(2) GM3 ATM/ANS.OR.B.005(a)(2) Management system SAFETY CULTURE and ATS.OR.200 'Safety management system' (1)(i) AMC1 ATS.OR.200 (1)(i) 'Safety management system'	AMC1 ATCO.OR.C.001(b) 'Management system of training organisations' points (c), (e) and (f)
AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]			

Annex 19 reference & text

1.1.5 The safety policy shall

d) clearly indicate which types of behaviors are unacceptable related to the service provider’s aviation activities and include the circumstances under which disciplinary action would not apply.

See also Reg. (EU) 376/2014 Article 16.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
A Just Culture Policy and principles have been defined that clearly identifies acceptable and unacceptable behaviours to promote a Just Culture.		There is evidence of the Just Culture policy and supporting principles being applied and promoted to staff.	The Just Culture policy is applied in a fair and consistent manner and people trust the policy. There is evidence that the line between acceptable and unacceptable behaviour has been determined in consultation with staff and staff representatives.

Verification Examples

- ISMS manual has SUITABLE commitment to Just Culture principles.
- Accountable Executives understand and committed to Just Culture.
- Safety Investigations appear to be carried out in just manner.
- There is no Just Culture process or tool.
- For ISMS Just Culture is also dependent on the Just Culture of the individual partner organisations.
- Little output so far due to immaturity of system.

Conclusion

A ‘Just’ Culture is evident when discussed, but system needs time to mature before a full assessment of operational output can be made, all necessary elements are in place.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Reg. 376/2014 Article 16(11) AMC1 ORO.GEN.200(a) (2) ‘Management system’ point (a)(4) ‘safety reporting principles’ - [complex organisations]	Reg. 376/2014 Article 16(11) AMC1 ORA.GEN.200(a) (2) ‘Management system’ point (a)(4) ‘safety reporting principles’ - [complex organisations]	Reg. 376/2014 Article 16(11) ADR.OR.D. 005 ‘Management system’ AMC1 ADR.OR. D.005(b)(2) ‘Management system’ point (b)(3)	Reg. 376/2014 Article 16(11) ATS.OR.200 ‘Safety management system’ (1)(i) AMC1 ATS.OR.200(1) (i) ‘Safety management system’ SAFETY POLICY – [complex ATS providers] ATM/ANS.OR.A.065	Reg. 376/2014 Article 16(11) AMC1 ATCO.OR.C.001(b) ‘Management system of training organisations’

Annex 19 reference & text

(New Std. 1.1.2)

1.1.6 Taking due account of its safety policy, the service provider shall define safety objectives.

The safety objectives shall:

- a) form the basis for safety performance monitoring and measurement as required by 3.1.2
- b) reflect the service provider’s commitment to maintain or continuously improve the overall effectiveness of the SMS
- c) be communicated throughout the organization
- d) be periodically reviewed to ensure they remain relevant and appropriate to the service provider.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
Safety objectives have been established that are consistent with the safety policy and there is a means to communicate them throughout the organisation.		Safety objectives are relevant to the organisation and are being regularly reviewed and are communicated throughout the organisation.	Achievement of the safety objectives is being monitored by senior management and action taken to ensure they are being met.

Verification Examples

- According to the ISMS Safety manual (Section 1.1) Safety Objectives will be set in the future as the ISMS develops.
- The ISMS Manual does state the purpose of the ISMS which is to *improve (the management of) safety at Schiphol by better cooperation between the organisations involved*. There are also areas of added value which are: Better focus, sector wide decision making, better insight and integral external reporting.
- The ISMS Manual (section 3.4) defines success factors for judging successful implementation of the ISMS.

Conclusion

Safety Objectives are not yet specifically set nor how they shall be monitored and measured but the purpose details and success factors identified are a sound basis for setting objectives on as the ISMS matures.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a) (2) ‘Management system’ point (c)(3) - [complex organisations]	AMC1 ORA.GEN.200(a) (2) ‘Management system’ point (c)(3) - [complex organisations]	AMC1 ADR.OR.D.005(b) (2) Management system point (c)(3)	ATM/ANS.OR.B.005(a)(3) ‘Management system’	ATCO.OR.C.001 Management system of training organisations
AMC1 ORO.GEN.200(a)(3) Management system point (d) (1) - [complex organisations]	AMC1 ORA.GEN.200(a)(3) Management system point (d) (1) - [complex organisations]		AMC2 ATM/ANS.OR.B.005(a) (3) Management system	AMC1 ATCO.OR.C.001(b) Management system of training organisations
AMC2 ORO.GEN.200(a)(5) Management system point (a) - [complex organisations]	AMC2 ORA.GEN.200(a)(5) Management system point (a) - [complex organisations]		AMC1 ATS.OR.200(1) (i) Safety management system	SAFETY POLICY
			SAFETY POLICY — COMPLEX ATS PROVIDERS point (b)(3)	

1.2 Safety Accountability and Responsibilities

Annex 19 reference & text

1.2.1 The service provider shall

a) identify the accountable executive who, irrespective of other functions, is accountable on behalf of the organization, for the implementation and maintenance of an effective SMS

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
An accountable manager has been appointed with full responsibility and ultimate accountability for the SMS.		The accountable manager ensures that the SMS is properly resourced, implemented and maintained and has the authority to stop the operation if there is an unacceptable level of safety risk.	The accountable manager ensures that the performance of the SMS is being monitored, reviewed and improved.

Verification Examples

- The ISMS is not a classic organisation as it consists of several partners which all have accountable executives so there is not one accountable entity but the Safety Review Board is the executive committee.
- All SRB members must be accountable within their own organisation.
- There are clear terms of reference for the SRB members detailing their responsibilities. (ISMS Manual section 3).
- An operational understanding of safety management is a key requisite of an accountable executive involved in the ISMS.

Conclusion

The SRB visibly engaged in ensuring the Management System is OPERATING. However, as noted at 1.1.6 the lack of effective safety objectives is hampering the Accountable Executives in gauging the return on investment in safety improvement efforts.

The committee approach to accountability within the joint organisation is clearly documented and appears to function well with the current SRB members.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(1)	ORA.GEN.200 'Management system' point (a)(1)	ADR.OR.D.015 'Personnel requirements' point (a)	ATS.OR.200 'Safety management system' point (1)(ii)(iii)	ATCO.OR.C.001 Management system of training organisations, (a)
ORO.GEN.210 'Personnel requirements' point (a)	ORA.GEN.210 'Personnel requirements' point (a)		AMC1 ATS.OR.200(1)(ii);(iii) Safety management system ORGANISATION AND ACCOUNTABILITIES AMC2 ATS.OR.200(1)(ii);(iii) Safety management system ORGANISATION AND ACCOUNTABILITIES [complex ATS providers]	ATCO.OR.C.010 'Personnel requirements' point (a)

Annex 19 reference & text

1.2.2 The service provider shall

- b) clearly define lines of safety accountability throughout the organization, including a direct accountability for safety on the part of senior management,
- c) identify the responsibilities of all members of management, irrespective of other functions, as well as of employees, with respect to the safety performance of the organisation
- d) document and communicate safety accountability, responsibilities, and authorities throughout the organization,
- e) define the levels of management with authority to make decisions regarding safety risk tolerability.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The safety accountability, authorities and responsibilities are clearly defined and documented.		Everyone in the organisation is aware of and fulfil their safety responsibilities, authorities and accountabilities and encouraged to contribute to the SMS.	The accountable manager and the senior management team are aware of the risks faced by the organisation and safety management system principles exist throughout the organisation so that safety is part of the everyday language.

Verification Examples

- The ISMS consists of representatives from the various partners meeting and cooperating to provide a safety management system, the organisational structure and governance is well documented (ISMS Manual section 3.5).
- The ISMS functions through a structure of meetings these are :
 Safety Review Board.
 Top SAG (Safety Action Group)
 Core Team
 Standing Committee Flight
 Standing Committee Ground
 Task Forces
 Workshops (for example the Risk assessment workshop)
 These meetings are well structured and documented to provide credible insight and information into risk exposure.

Conclusion

Senior Leaders' safety responsibilities and authority are clearly documented, understood and carried out. As before, the issues raised at 1.1.6 and 3.1.1, regarding providing useful assurance, are holding them back from achieving EFFECTIVE but this is more a question of system maturity.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
b) ORO.GEN.200 'Management system' point (a)(1)	b) ORA.GEN.200 'Management system' point (a)(1)	b) ADR.OR.D. 005 'Management system' point (b)(1)	b) ATM/ANS.OR.B.005(a)(1) and (b), ATS.OR.200 'Safety management system' (1)(ii)	b) ATCO.OR.C.001 'Management system of training organisations' point (a)
c) ORA.GEN.200 'Management system' point (a)(1) ORO.GEN.210 'Personnel requirements' points (a) and (b)	c) ORA.GEN.200 'Management system' point (a)(1) ORA.GEN.210 'Personnel requirements' points (a) and (b)	c) ADR.OR.D. 005 'Management system' (b)(1) and ADR. OR.D.015 'Personnel requirements' (a);(b)	c) ATM/ANS.OR.B.005(a)(1) and ATS.OR.200(1)(ii)	c) ATCO.OR.C.001 'Management system of training organisations' point (b) ATCO.OR.C.010 Personnel requirements, point (a) and (b)

<p>d)</p> <p>ORO.GEN.200 'Management system' point (a)(5)</p> <p>AMC1 ORO.GEN.200(a)(5)</p> <p>AMC2 ORO.GEN.200(a)(5)</p> <p>[complex operators]</p>	<p>d)</p> <p>ORA.GEN.200 'Management system' point (a)(5)</p> <p>AMC1 ORA.GEN.200(a)(5)</p> <p>AMC1 ORA.GEN.200(a)(5)</p> <p>[complex organisations]</p>	<p>d)</p> <p>ADR.OR.D.005 'Management system' point (c), AMC1 ADR. OR.D.005(c) 'Management system' and AMC2 ADR. OR.D.005(c) 'Management system'</p>	<p>d)</p> <p>ATM/ANS.OR.B.005(a)(1) and ATS.OR.200 'Safety management system' (1)(ii)</p>	<p>d)</p> <p>ATCO.OR.C.001 'Management system of training organisations', point (e)</p>
<p>e)</p> <p>AMC1 ORO.GEN.200(a) (3) 'Management system' point (b)(2) - [complex operators]</p> <p>AMC1 ORO.GEN.200(a) (1)(2)(3)(5) 'Management system' point (d) - [non- complex organisations]</p>	<p>e)</p> <p>AMC1 ORO.GEN.200(a) (3) 'Management system' point (b)(2) - [complex operators]</p> <p>AMC1 ORO.GEN.200(a) (1)(2)(3)(5) 'Management system' point (d) - [non- complex organisations]</p>	<p>e)</p> <p>AMC1 ADR.OR.D.005(b)(4) 'Management system'</p>	<p>e)</p> <p>ATM/ANS.OR.B.005(a)(1) and ATS.OR.200 'Safety management system' 1)(ii)</p>	<p>e)</p> <p>ATCO.OR.C.001 'Management system of training organisations'</p>

1.3 Appointment of Key Personnel

Annex 19 reference & text

1.3.1 The service provider shall appoint a safety manager who is responsible for the implementation and maintenance of the SMS.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
A competent safety manager who is responsible for the implementation and maintenance of the SMS has been appointed with a direct reporting line with the accountable manager.	See Annex 19 Note:	The safety manager has implemented and is maintaining the SMS. The safety manager is in regular communication with the accountable manager and escalates safety issues when appropriate.	The safety manager is competent to manage the SMS and identifying improvements in a timely manner. There is a close working relationship with the accountable manager and the safety manager is considered a trusted advisor and given appropriate status in the organisation.

Verification Examples

- The Safety Manger has meetings with the SRB chair and appears to have an effective relationship.
- The SM demonstrates a high level of competence in his role.
- Accountable Executives report being comfortable with role of SM and ISO. The SM is well regarded and listened to.
- Attends SAG and Core Team meetings - well engaged.
- SM is able to manage a busy workload and delegate where necessary.
- The SM reports to the SRB.

Conclusion

The Safety Manager (and ISO team) is a highly competent individual in post with EFFECTIVE relationships with senior managers. A continuing development is currently not in place which would maintain the high level of competence.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.210 'Personnel requirements' point (b)	ORA.GEN.210 'Personnel requirements' point (b)	ADR.OR.D.015 'Personnel requirements' point (c) and AMC1 ADR.OR.D.015(c) 'Personnel requirements'	ATS.OR.200(1)(iii)	ATCO.OR.C.010 Personnel requirements
AMC1 ORO.GEN.200(a)(1) 'Management system' point (a)(1)- [complex operators]	AMC1-ORA.GEN.200(a)(1) 'Management system' point (a) (1)- [complex organisations]			
AMC1 ORO.GEN.200(a) (1);(2);(3);(5) 'Management system' point (c)- [non-complex operators]	AMC1-ORA.GEN.200(a) (1);(2);(3);(5) 'Management system' point (c)- [non-complex organisations]			

Annex 19 Note: Depending on the size of the service provider and the complexity of its aviation products or services, the responsibilities for the implementation and maintenance of the SMS may be assigned to one or more persons, fulfilling the role of safety manager, as their sole function or combined with other duties, provided these do not result in any conflicts of interest.

1.3.2 EASA reference: Management System AMCs for complex organisations				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
The organisation has established appropriate safety committees(s) that discuss and address safety risks and compliance issues and includes the accountable manager and the heads of functional areas.		There is evidence of meetings taking place in accordance with the terms of reference detailing the attendance and frequency of meetings. The safety committees monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources, actions are being monitored and appropriate safety objectives and SPLs have been established.	Safety committees include key stakeholders. The outcomes of the meetings are documented and communicated and any actions are agreed, taken and followed up in a timely manner. The safety performance and safety objectives are reviewed and actioned as appropriate.	
Verification Examples				
<ul style="list-style-type: none"> Comprehensive structure of safety meetings. Changes are discussed for safety implications and business plans are drawn up of funding needed for mitigations. Again due to system maturity regarding safety objectives and performance indicators the safety assurance aspects require development. 				
Conclusion				
The structure of safety meetings is comprehensive. However, the issues raised at 1.1.6 and 3.1.1, do again impact the effectiveness aspect.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a) (1) 'Management system' points (b), (c) and (d)	AMC1 ORA.GEN.200(a) (1) 'Management system' points (b), (c) and (d)	AMC1 ADR.OR.D.005(b)(1) 'Management system'	<p>Note; An air traffic services provider should be considered as complex unless it is eligible to apply for a limited certificate and fulfils the criteria set out in ATM/ANS.OR.A.010(a).</p> <p>AMC1 ATS.OR.200(1)(i) Safety management system</p> <p>AMC1 ATS.OR.200(1)(ii) Safety management system</p> <p>ACCOUNTABILITIES [complex ATS providers]</p> <p>AMC2 ATS.OR.200(1)(ii);(iii) Safety management system</p> <p>ORGANISATION AND ACCOUNTABILITIES [complex ATS providers]</p>	Not applicable

1.4 Emergency Response - not in scope of Performance Audit

I.5 SMS Documentation

Annex 19 reference & text

1.5.1 The service provider shall develop and maintain an SMS manual that describes its:

- a) safety policy and objectives
- b) SMS requirements
- c) SMS processes and procedures
- d) accountability, responsibilities and authorities for SMS processes and procedures

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The SMS documentation includes the policies and processes that describe the organisation’s safety management system and processes.	See Annex 19 note	SMS documentation is consistent with other internal management systems and is representative of the actual processes in place. Changes to the SMS documentation are managed Everyone has easy access to, familiar with and follow the relevant parts of the SMS documentation.	SMS Documentation is proactively reviewed for improvement

Verification Examples

- The ISMS Manual has been tailored to the operation but does fulfill best practice and follows the ICAO Annex 19 principles.
- There has been updates to the ISMS Manual.
- Accountable Executives and managers are well versed in the ISMS Manual.
- Access to the manual was from the ISO but there was no apparent common system to share the documentation so access was suitable for the organisational set up but could be more open.

Conclusion

The ISMS Manual covers the requirements of the organisation and is demonstrably in use. Again the whole system is immature and a future proactive review of the manual would lead to an EFFECTIVE conclusion.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(5) ‘Management system’ point (a)	ORA.GEN.200 ‘Management system’ point (a)(5)	ADR.OR.D.005 ‘Management system’ point (c) and AMC1 ADR.OR.D.005(c)	ATM/ANS.OR.B.005(b)	AMC1 ATCO.OR.C.001(e) Management system of training organisations
AMC2 ORO.GEN.200(a)(5) - [complex operators]	AMC1 ORO.GEN.200(a)(5) ‘Management system’ point (a)	‘Management system’,AMC2 ADR.OR.D.005(c) ‘Management system’	AMC1 ATM/ANS. OR.B.005(b) ‘Management system’ and Annex IV ATS. OR.200(1)(v)	Point (e)(8)
	AMC1 ORO.GEN.200(a)(5)- [complex organisations]		AMC1 ATS.OR.200(1)(v) Safety management system	

Annex 19 Note: Depending on the size of the service provider and the complexity of its aviation products or services, the SMS manual and SMS operational records may be in the form of stand-alone documents or may be integrated with other organizational documents (or documentation) maintained by the service provider..

Annex 19 reference & text				
1.5.2 The service provider shall develop and maintain SMS operational records as part of its SMS documentation.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
The SMS documentation defines the SMS outputs and which records of SMS activities will be stored.		SMS activities are appropriately stored and found to be complete and consistent with appropriate data protection and control.	SMS records are routinely used as inputs for safety management related tasks and continuous improvement of the SMS	
Verification Examples				
<ul style="list-style-type: none"> The ISMS Manual details record control, including data protection. 				
Conclusion				
Management system records and data are protected and used, to reach EFFECTIVE the data should be used proactively, again a system maturity issue.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.220 'Record-keeping'	ORA.GEN.220 'Record-keeping'	ADR.OR.D.035 'Record keeping'	ATM/ANS.OR.B.030 Record keeping	ATCO.OR.C.020 Record keeping
AMC1 ORO.GEN.220(b) 'Record-keeping'	AMC1 ORA.GEN.220(b) 'Record-keeping'	AMC1 ADR.OR.D.035 'Record keeping'	ATS.OR.200(1)(v) AMC2 ATS.OR.200(1) (v) Safety management system	AMC1 ATCO.OR.C.020(a);(b) Record keeping
		AMC2 ADR.OR.D.035 'Record keeping'		

2. Safety Risk Management

2.1 Hazard Identification

Annex 19 reference & text				
2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services. Hazard identification shall be based on a combination of reactive and proactive methods.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external).		The hazards are identified and documented. Human and organisational Factors related hazards are being identified.	The organisation has a register of the hazards that is maintained and reviewed to ensure it remains up to date. It is continuously and proactively identifying hazards related to its activities and operational environment and involves all key personnel and appropriate stakeholders. Hazards are assessed in a systematic and timely manner	
Verification Examples				
<ul style="list-style-type: none"> • There is a well documented process in the ISMS Manual (section 4.1) which is in use. • The system is starting to show output with identified hazards sent to the Risk Workshop for risk assessment. • Example of recent Hazard Identification report “Misaligned take off” and risk assessment thereof. • Hazard Identification has shown results with reduction of runway incursion events and a study of late runway changes. 				
Conclusion				
There are hazards identification methods in place and OPERATING, pre-dominantly through safety reporting and management of change activities, and a process for analysing them; furthermore, there is statistical analysis of the available data being undertaken to prioritise hazards.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 ‘Management system’ point (a)(3)	ORA.GEN.200 ‘Management system’ point (a)(3)	ADR.OR.D.005 ‘Management system’ point (b)(3)	ATM/ANS.OR.B.005(a)(5) ATS.OR.200(2)(i)	ATCO.OR.C.001 Management system of training organisations point (c)
AMC1 ORO.GEN.200(a)(3) ‘Management system’ point (a)(1) - [complex operators]	AMC1 ORA.GEN.200(a)(3) ‘Management system’ point (a)(1) - [complex organisations]	AMC1 ADR.OR.D.005(b)(3) ‘Management system’	AMC1 ATS.OR.205(b)(1) AMC2 ATS.OR.205(b)(1)	AMC1 ATCO.OR.C.001(c) ‘Management system of training organisations’
AMC1 ORO.GEN.200(a)(1);(2);(3);(5) ‘Management system’ points (a), (b) and (d) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1);(2);(3);(5) ‘Management system’ points (a), (b) and (d) - [non-complex organisations]			

2.1.2 Regulation (EU) 376/2014 and Annex 19 Appendix 2 Std. 1.1.1.c) safety reporting procedures				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
<p>There is a confidential reporting system to capture mandatory occurrences and voluntary reports that includes a feedback system and stored on a database.</p> <p>Responsibilities have been defined as required by Reg. (EU) 376/2014.</p> <p>The process identifies how reports are actioned and timescales specified.</p>		<p>The reporting system is simple to use, being used and accessible to all personnel.</p> <p>There is feedback to the reporter of any actions taken (or not taken) and, where appropriate, to the rest of the organisation.</p> <p>Reports are evaluated, processed, analysed and stored.</p> <p>People are aware and fulfil their responsibilities in respect of the reporting system</p> <p>Reports are processed within the defined timescales.</p>	<p>There is a healthy reporting system based on the volume of reporting and the quality of reports received.</p> <p>Safety reports are acted on in a timely manner</p> <p>Personnel express confidence and trust in the organisations reporting policy and process.</p> <p>The reporting system is being used to make better management decision making and continuous improvement</p> <p>The reporting system is available for third parties to report (partners, suppliers, contractors).</p>	
Verification Examples				
<ul style="list-style-type: none"> • Each separate organisation has their own reporting system from which issues are fed into the ISMS. • The state aviation occurrence analysis agency (ABL) could be a source of combined data and proactive hazard identification into the ISMS but this output does require improvement. There has been a meeting between ABL and ISMS ISO to strengthen the relationship. 				
Conclusion				
<p>The handling of safety reports is SUITABLE for the needs of the ISMS organisation with reports primarily being handled within individual organisations. Therefore the assessment in this area cannot be higher than SUITABLE unless the ISMS implements a common reporting system for all of its members but this may not be practicable or even desirable to the needs of the individual partners.</p>				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
<p>Regulation (EU) 376/2014 Article 4 'Mandatory reporting', Article 5 'Voluntary reporting', Article 13 'Occurrence analysis and follow-up at national level', Article 16 'Protection of the information source'.</p>				

2.2 Risk Assessment and Mitigation

Annex 19 reference & text

2.2.1 The service provider shall develop and maintain a process that ensures **analysis, assessment** [and control] of the safety risks associated with identified hazards.

See Annex 19 note.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process for the analysis and assessment of safety risks. The level of risk the organisation is willing to accept is defined.		<p>Risk analysis and assessments are carried out in a consistent manner based on the defined process.</p> <p>The defined risk acceptability is being applied.</p>	<p>Risk analysis and assessments are reviewed for consistency and to identify improvements in the processes. Risk assessments are regularly reviewed to ensure they remain current.</p> <p>Risk acceptability criteria are used routinely and applied in management decision making processes and are regularly reviewed.</p>

Verification Examples

- There is a clearly defined process within the ISMS Manual (section 4.2)
- Risks are assessed at a Risk Workshop initiated by the Core Team and facilitated by the NLR (National Aerospace Laboratory).
- At the Risk Workshop (observed during Audit) subject matter experts from each organisation assess the risk against their own criteria and tolerability before then plotting on the Common Risk Matrix for recommendation to the TOP SAG for decision as to tolerability from a ISMS perspective.
- The Top 5 Risks for Flight and Ground are defined and reviewed. These are:
 - Flight
 - Loss of Control during take off
 - Loss of Control during landing flare
 - Loss of separation in flight while under ATC control
 - Bird Strike
 - Runway incursion
 - Ground
 - Damage caused to an aircraft during ground handling
 - Damage and injuries caused by collisions on service roads and stands
 - Injuries due to falls from height on aircraft stand
 - Damage and injuries caused during aircraft docking
 - Injuries due to slips, trips, entrapment or electrocution at aircraft stand

Conclusion

There are examples of good risk assessment processes and behaviours in evidence; indeed, the acceptance and knowledge of risk principles by the management team was particularly notable. The methodology of how risk is assessed for a combined organisation is innovative and appears to function well. The system needs to mature so output can be reviewed for consistency.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3)	ORA.GEN.200 'Management system' point (a)(3)	ADR.OR.D.005 'Management system' point (b)(4) and AMC1 ADR.OR.D.005(b)(4) 'Management system'	ATS.OR.200(2)(i)	ATCO.OR.C.001 'Management system of training organisations' point (c)
AMC1 ORO.GEN.200(a)(3) 'Management system' point (b)(1) - [complex operators]	AMC1 ORA.GEN.200(a)(3) 'Management system' point (b)(1) - [complex organisations]			AMC1 ATCO.OR.C.001(c) 'Management system of training organisations'
AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex organisations]			

Annex 19 Note: The process may include predictive methods of safety data analysis.

Annex 19 reference & text

2.2.2 The service provider shall develop and maintain a process that ensures [analysis, assessment and] **control** of the safety risks associated with identified hazards.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has a process in place to decide and apply the appropriate risk controls.		Appropriate risk controls are being applied to reduce the risk to an acceptable level including timelines and allocation of responsibilities. Human Factors are considered as part of the development of risk controls	Risk controls are practical and sustainable and applied in a timely manner and do not create additional risks. Risk Controls take into consideration Human Factors.

Verification Examples

- Risk controls have been initiated but currently too early to assess their impact.
- Example: success with objective to reduce runway incursion risk (initiative started before ISMS implementation but concluded by ISMS).

Conclusion

There are good attempts to implement effective controls, and a system to support implementation. How effective these controls are at controlling risk to a tolerable level cannot yet be fully determined – see 3.1.1. The joint nature of the ISMS means that the risk control is potentially “owned” by one (or few, not all) partner(s) this means that the cooperation and commitment to the ISMS is paramount to success.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO. GEN.200(a)(3) ‘Management system’ point (b)	AMC1 ORA.GEN.200(a) (3) ‘Management system’ point (b)	AMC1 ADR.OR.D.005(b)(4) ‘Management system’	ATS.OR.200(2)(i)	ATCO.AR.B.001 Management system, (a)(4); Furthermore, ATSP provisions apply.

3. Safety Assurance

3.1 Safety Performance Monitoring and Measurement

Annex 19 reference & text				
3.1.1 The service provider shall develop and maintain the means to verify the safety performance of the organization and to validate the effectiveness of safety risk controls.				
See Annex 19 Note.				
PRESENT	SUITABLE	OPERATIONAL		EFFECTIVE
There is a process in place to assess whether the risk controls are applied and effective.		Risk controls are being verified to assess whether they are applied and effective.		Risk controls are assessed and actions taken to ensure they are effective and delivering a safe service. The reasons for ineffectiveness of risk controls are investigated.
Verification Examples				
<ul style="list-style-type: none"> • Performance measures on risk controls are yet to be defined. • There is some output in SPIs currently measured and reported: <ul style="list-style-type: none"> ○ Damage caused to an aircraft during Ground Handling ○ Loss of Control (Take Off) ○ Landing (Late Runway changes) ○ Bird Strike ○ Runway Incursion • Whilst effectiveness of risk controls is documented and discussed in several meetings, including SRB and TOP SAG measures are largely subjective and narrative based, there is potential for more quantitative analysis to be conducted. • An annual review of the workplan takes place. 				
Conclusion				
The effectiveness of controls is largely subjective, there is little quantitative analysis to prove controls are maintaining the residual risk at the expected level and are delivering a return on investment. There is a plan to formalize Safety Performance Indicators and this should aid in improving this into OPERATING.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex operators]	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex organisations]	ADR.OR.D.005 'Management system' point (b)(5) and AMC1 ADR.OR.D.005(b)(5) 'Management system'	ATS.OR.200 (3)(i)	Not applicable, however Air Traffic Service Provider provisions apply.

Annex 19 Note: An internal audit process is one means to monitor compliance with safety regulations, the foundation upon which SMS is built, and assess the effectiveness of these safety risk controls and the SMS. Guidance on the scope of the internal audit process is contained in the Safety Management Manual (SMM) (Doc 9859).

Annex 19 reference & text

3.1.2 The service provider’s safety performance shall be verified in reference to the safety performance indicators and safety performance targets of the SMS in support of the organization’s safety objectives.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process in place on how the safety performance of the organisation will be measured including safety performance indicators and targets linked to the organisation’s safety objectives.		The safety performance of the organisation is being measured and the SPIs are being continuously monitored and analysed for trends.	<p>SPIs are demonstrating the safety performance of the organisation and the effectiveness of risk controls based on reliable data.</p> <p>SPIs are reviewed and regularly updated to ensure they remain relevant.</p> <p>Where the SPIs indicate a risk control not being effective appropriate action is taken.</p>

Verification Examples

- The few SPIs currently in use are largely based on lagging, reactive occurrence data.
- The Safety performance is reviewed annually as to how effective the workplan has been.
- No formal Safety Objectives yet set or SPIs defined as to how these objectives are met or performance assessed.

Conclusion

Some SPIs are used to monitor some areas of the Top 5 risks but these are yet to be formalized and fully included in the Safety assurance section of the ISMS Manual. Once the System matures and Objectives set it is expected that the ISMS should move into OPERATING.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 ‘Management system’ point (a)(3) AMC1 ORO.GEN.200(a)(3) ‘Management system’ point (d)(1) - [complex operators]	ORA.GEN.200 ‘Management system’ point (a)(3) AMC1 ORO.GEN.200(a)(3) ‘Management system’ point (d)(1) - [complex organisations]	ADR.OR.D.005 ‘Management system’ point (b)(5) and AMC1 ADR.OR.D.005(b)(5) ‘Management system’	ATM/ANS.OR.B.005(a)(3) AMC2 ATM/ANS.OR.B.005(a)(3) Management system AMC1 ATS.OR.200(1)(v) Safety management system	Not applicable, however Air Traffic Service Provider provisions apply.

3.2 The Management of Change

Annex 19 reference & text

3.2.1 The service provider shall develop and maintain a process to identify changes which may affect the level of safety risk associated with its aviation products or services and to identify and manage the safety risks that may arise from those changes.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has established a management of change process to identify whether changes have an impact on safety and to manage any identified risks in accordance with existing safety risk management processes.		<p>The management of change process is being used. It includes hazard identification and risk assessments with appropriate risk controls being put in place before the decision to make the change is taken.</p> <p>Human Factors issues have been considered and being addressed as part of the change management process.</p>	The management of change process is used for all safety related changes including Human Factors issues and considers the accumulation of multiple changes. It is initiated in a planned, timely and consistent manner and includes follow up action that the change was implemented safely.

Verification Examples

- One example of output so far which is the new taxiway (QQ) proposal.
- Planned changes are assessed for safety risk and checked through SRB.
- The Management of Change process is well documented (ISMS Manual 4.1.3) and in use.
- The joint ISMS Management of Change process assesses the joint risks for each change. Each individual partner organisation must then also assess the change risk, this being clearly stated in the ISMS Manual.

Conclusion

The awareness of when a Management of Change process is required is good and it is only the little output because of the maturity and the lack of adequate safety assurance as discussed at 3.1 that is holding it back from being truly EFFECTIVE.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3)	ORA.GEN.200 'Management system' point (a)(3)	ADR.OR.D.005 'Management system' point (b)(6) and AMC1 ADR.OR.D.005(b)(6)	ATM/ANS.OR.A.040 Changes — general	AMC1 ATCO.OR.C.001(e) Management system of training organisations point (c)
AMC1 ORO.GEN.200(a) (3) 'Management system' point (e) - [complex operators]	AMC1 ORA.GEN.200(a) (3) 'Management system' point (e) - [complex organisations]	ADR.OR.B.040 'Changes' in particular point (f)	ATM/ANS.OR.A.045 Changes to a functional system	
AMC1 ORO.GEN.200(a) (1);(2);(3);(5) 'Management system' point (b) - [non-complex operators]	AMC1 ORA.GEN.200(a) (1);(2);(3);(5) 'Management system' point (b) - [non-complex organisations]		ATM/ANS.OR.B.005(a)(4)	
			ATM/ANS.OR.B.010 Changes - General	
			ATS.OR.205 Safety assessment and assurance of changes to the functional system ATS.	
			OR.210 Safety criteria	

3.3 Continuous Improvement of the SMS

Annex 19 reference & text

3.3.1 The service provider shall monitor and assess its SMS processes to maintain or continuously improve the overall effectiveness of the SMS.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process in place to monitor and review the effectiveness of the SMS using the available data and information.		There is evidence of the SMS being periodically reviewed to support the assessment of its effectiveness and appropriate action being taken.	The assessment of SMS effectiveness uses multiple sources of information including the safety data analysis that supports decisions for continuous improvements.

Verification Examples

- The requirement to continuously improve the Management System is documented in the ISMS Manual
- This PA is part of a cycle of continuous improvement.
- There are plans for Management System improvements.
- The Schiphol Safety Improvement Covenant gives mandate for further development of the ISMS.

Conclusion

There are plans to develop the ISMS further, this PA is designed to show the current maturity on the PSOE scale which can then be reassessed to demonstrate the progress and effectiveness of management system development.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Reg. 216/2008 Essential requirements for air operations point 8.a.4 ORO.GEN.200 'Management system' point (a)(3) and (a)(6) AMC1 ORO.GEN.200(a)(3) 'Management system' point (f) - [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' point (e) - [non-complex operators]	Reg. 216/2008 Essential requirements for pilot licensing point 3.a.1(ii) for ATOs and 4.c.1(ii) for AeMCs ORA.GEN.200 'Management system' point (a)(3) and (a)(6) AMC1 ORO.GEN.200(a)(3) 'Management system' point (f) - [complex organisations] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' point (e) - [non-complex organisations]	ADR.OR.D.005 'Management system' point (b)(7) and AMC1 ADR.OR.D.005(b)(7) 'Management system'	ATS.OR.200(2)(iii)	AMC1 ATCO.OR.C.001(e) Management system of training organisations point (b)

4. Safety Promotion

4.1 Training and Education

Annex 19 reference & text

4.1.1 The service provider shall develop and maintain a safety training programme that ensures that personnel are trained and competent to perform their SMS duties.

The scope of the safety training programme shall be appropriate to each individual’s involvement in the SMS.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a training programme for SMS in place that includes initial and recurrent training. The training covers individual safety duties (including roles, responsibilities and accountabilities) and how the organisation’s SMS operates.		The SMS training programme is delivering appropriate training to the different staff in the organisation and being delivered by competent personnel.	SMS Training is evaluated for all aspects (learning objectives, content, teaching methods and styles, tests) and is linked to the competency assessment. Training is routinely reviewed to take into consideration feedback from different sources.

Verification Examples

- The individual partners each have their own training programmes and there are clear Skills and Qualities required of the ISMS team members defined to ensure that competent staff are involved.
- The Integral Safety Office staff are subject to the standard Schiphol HR & performance management programme.
- The ISO staff procedures are planned to be incorporated into the ISMS Manual later this year.
- There is no distinct safety or safety continuation programme for the ISO staff currently.

Conclusion

The competence requirements are in place but for the ISO staff who are at the core of the ISMS there is currently no safety training programme above the Schiphol standard. There are plans to formalize this later this year which once active should move this item from SUITABLE to OPERATING.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 ‘Management system’ point (a)(4)	ORA.GEN.200 ‘Management system’ point (a)(4)	ADR.OR.D.005 ‘Management system’ (b)(8) and AMC1 ADR.OR.D.005(b)(8)	ATM/ANS.OR.B.005(a)(6) Annex IV ATS.OR.200 ‘Safety management system’ (4)(i)	ATCO.OR.C.001 ‘Management system for training organisation’, point (d)
AMC1 ORO.GEN.200(a)(4) ‘Management system’ point (a)	AMC1 ORA.GEN.200(a)(4) ‘Management system’ point (a)			

4.1.2 EASA reference					
EASA ORX.GEN.200(a)(4) requirements for maintaining personnel trained and competent to perform their safety and compliance tasks					
PRESENT		SUITABLE	OPERATIONAL		EFFECTIVE
There is a process in place to ensure that the organisation has trained and competent personnel.		Competence described for Partners. ISO assessed separately.	There is evidence of the process being used and being recorded.		The competency assessment programme takes appropriate remedial action when necessary and feeds into the training programme.
Verification Examples					
<ul style="list-style-type: none"> Specifically relevant to the Integral Safety Office. The Skills and Qualities required of SRB, TOP SAG, and the Flight & Ground Standing Committees are described in the ISMS Manual Appendices. 					
Conclusion					
There is SUITABLE description of the Skills and Qualities required of the management team members within the ISMS. Separate descriptions of the ISO competences and training are currently not in place.					
Corresponding EU/EASA Requirements					
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations	
ORO.GEN.200 'Management system' point (a)(4) AMC1 ORO.GEN.200(a)(4) 'Management system' point (a)	ORA.GEN.200 'Management system' point (a)(4) AMC1 ORO.GEN.200(a)(4) 'Management system' point (a)	ADR.OR.D.005 'Management system' (b)(8) and AMC1 ADR.OR.D.005(b)(8)	ATM/ANS.OR.B.005(a)(6) Annex IV ATS.OR.200 'Safety management system' (4)(i))	AMC1 ATCO.OR.C.001(d) Management system of training organisations PERSONNEL	

4.2 Safety Communication

Annex 19 reference & text

4.2.1 The service provider shall develop and maintain a formal means for safety communication that:

- ensures personnel are aware of the SMS to a degree commensurate with their positions
- conveys safety-critical information
- explains why particular actions are taken to improve safety; and
- explains why safety procedures are introduced or changed

See also Reg. (EU) 376/2014 (Article 13(3))

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process to determine what safety critical information needs to be communicated and how it is communicated throughout the organisation to all personnel as relevant. This includes contracted organisations and personnel where appropriate.	Within context of joint organisation	Safety critical information is being identified and communicated throughout the organisation to all personnel as relevant including contracted organisations and personnel where appropriate.	The organisation analyses and communicates safety critical information effectively through a variety of methods as appropriate to maximise it being understood. Safety communication is assessed to determine how it is being used and understood and to improve it where appropriate.

Verification Examples

- The ISMS has the objective to share safety information, also to and from external parties, and create awareness of safety risks at Schiphol. The communication on safety is not limited to specific safety magazines or newsletters; it is also applicable to, for example, meetings, training sessions, manuals, procedures and feedback to employees.
- The following safety promotion objectives can be identified for Schiphol:
 - Improve the safety culture and safety performance;
 - Provide information on safety issues, safety metrics, specific threats and barriers;
 - Raise awareness of initiatives to address known safety issues and anticipate new ones;
 - Improve reporting
- The ISMS currently does not plan to have its own communication identity but support the partners with information to enhance their own safety communication. No concrete examples evident as yet.

Conclusion

The communication strategy is **SUITABLE** for the context of the joint organisation. Future example of specific output would demonstrate that this could become **OPERATING**.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(4)	ORA.GEN.200 'Management system' point (a)(4)	ADR.OR.D.005 'Management system' point (b)(9) and AMC1 ADR.OR.D.005(b)(9)	ATM/ANS.OR.B.005(a)(7) ATS.OR.200(4)(ii)	Not applicable, however Air Traffic Service Provider provisions apply.
ORO.GEN.200 'Management system' point (a)(5)	ORA.GEN.200 'Management system' point (a)(5)	ADR.OR.D.005(b)(9) 'Management system'	AMC1 ATM/ ANS.OR.B.005(a) (7) Management system	
AMC1 ORO.GEN.200(a) (4) 'Management system' point (b)	AMC1 ORA.GEN.200(a) (4) 'Management system' point (b)			

5. Additional Items to be Considered

These additional items included for the assessment relate to EASA Management System requirements or new notes in Annex 19 Edition 2. They are considered important parts of an effective SMS.

5.1 Interface Management

Annex 19 reference & text				
5.1.1 Appendix 2 Note 2.—				
The service provider’s interfaces with other organizations can have a significant contribution to the safety of its products or services.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.		The organisation is managing the interfaces through hazard identification and risk management. There is assurance activity to assess risk mitigations being delivered by external organisations.	The organisation has a good understanding of interface management and there is evidence that interface risks are being identified and acted upon. Interfacing organisations are sharing safety information and take actions when needed.	
Verification				
<ul style="list-style-type: none"> The reason for the ISMS’ existence is to provide a management of risk across the interfaces of the partner organisations and within this it is OPERATING with a functioning system that is providing output. The proactive use of data could be used to enhance the ISMS’ hazard identification, for this the interface with the State Aviation Occurrence Analysis Agency (ABL) is paramount. The ABL’s understanding of aviation safety specifics and what type of data and analysis are required of them could be greatly enhanced by a close relationship with the ISMS via the ISO. If the ISO could mentor the ABL analysts there could be a net gain all round. 				
Conclusion				
There is a high degree of involvement from all the partners in making the ISMS work across the risk interfaces, this also enhances cooperation and understanding. The only element holding the ISMS back from being EFFECTIVE is the maturity of the system. If progress is made as expected the ISMS will be industry leading in the way interface management between multi-partners is conducted.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Not explicitly addressed See ORO.GEN.205 ‘Contracted activities’ and related GM1 & 2	Not explicitly addressed See ORA.GEN.205 ‘Contracted activities’ and related GM1 & 2	ADR.OR.D.010 ‘Contracted activities’ and ADR.OR.D.025 ‘Coordination with other organisations’	ATM/ANS.OR.B.005 ‘Management system’ point (f) GM1 ADR.OR.B.040(f) ‘Changes’ points (b)(2) and (b)(3)	Not explicitly addressed

5.2 Responsibilities for Compliance and Compliance Monitoring Function

5.2.1 Responsibilities and accountability for ensuring compliance are defined				
PRESENT	SUITABLE	OPERATIONAL		EFFECTIVE
Applicable requirements are clearly identified and properly transcribed into organisation manuals and procedures. Responsibilities and accountabilities for compliance are defined for all staff.		Organisation manuals and procedures are regularly reviewed in light of changes in applicable requirements. All staff are aware of their responsibilities and accountabilities for compliance and to follow processes and procedures.	Enhancements to processes and procedures are suggested from the workforce and management. Individuals are proactively identifying and reporting potential non-compliances.	
Verification Examples				
<ul style="list-style-type: none"> There is no specific regulation or requirement for an organisation such as the ISMS which is on top of the individual partners requirements for a Management System. The Schiphol Safety Improvement Covenant provides the mandate for the ISMS. 				
Conclusion				
Not applicable and not included in overall assessment scoring.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.205 'Personnel requirements' point (b)	ORA.GEN.205 'Personnel requirements' point (b)	ADR.OR.D.005 'Management system' point (b)(11)	ATM/ANS.OR.B.020 Personnel requirements	ATCO.OR.C.010 Personnel requirements, point (b)

5.2.2 Responsibilities and accountabilities for compliance monitoring are defined

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
<p>It has been documented that there is a person or group of persons with responsibilities for compliance monitoring including the person acting as compliance monitoring manager with direct access to the accountable manager.</p> <p>The accountable manager's accountability and responsibilities for compliance monitoring is documented.</p>		<p>The compliance monitoring manager has implemented and is maintaining a compliance monitoring programme</p> <p>The accountable manager is ensuring there are sufficient compliance monitoring resources and independence of the audit function is being maintained.</p>	<p>The organisation has established a method to assess the efficiency and effectiveness of the compliance monitoring activities with feedback to the accountable manager.</p> <p>The accountable manager and senior management actively seek feedback on the status of compliance monitoring activities.</p>

Verification Examples

- There is no defined compliance accountability or responsibility.
- There is no regulation to be compliant to.

Conclusion

Not applicable and not included in overall assessment scoring.
 An internal check of compliance against the ISMS Manual currently not in place.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO. GEN.200(a)(6) 'Management system' point (c)	AMC1 ORA.GEN.200(a)(6) 'Management system' point (c)	AMC1 ADR.OR.D.005(b) (11) Management system point (b) and AMC2 ADR.OR.D.005(b) (11) Management system	AMC1 ATM/ANS. OR.B.005(c) Management system COMPLIANCE MONITORING	AMC2 ATCO.OR.C.001(f) Management system of training organisations COMPLIANCE MONITORING

5.2.3 Compliance monitoring programme				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
<p>The organisation has a compliance monitoring programme including details of the schedule of monitoring activities and procedures for audits and inspections, reporting, follow up and records.</p> <p>The way independence of compliance monitoring is achieved is documented.</p>		<p>The compliance monitoring programme is being followed and regularly reviewed.</p> <p>This includes the modification of the programme to address identified risks or organisational and operational changes.</p> <p>Compliance monitoring is independent from operational activities and includes contracted activities</p>	<p>The organisation regularly reviews its compliance monitoring programme and procedures to identify the need for changes and to ensure they remain effective.</p>	
Verification Examples				
<ul style="list-style-type: none"> • There is no Compliance Monitoring Programme • There is no regulation to be compliant to • This PA is part of a regular programme to assess management system performance but could not be considered a full compliance monitoring programme. 				
Conclusion				
<p>Not applicable and not included in overall assessment scoring. An internal check of compliance against the ISMS Manual is currently not in place.</p>				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
<p>AMC1 ORO.GEN.200(a) (6) 'Management system' Point (d)(2) (vi)</p> <p>GM2 ORO.GEN.200(a)(6) 'Management system' [complex organisations]</p> <p>GM3 ORO.GEN.200(a) (6) 'Management system' [non-complex organisations]</p>	<p>AMC1 ORO.GEN.200(a) (6) 'Management system' Point (d)(2) (vi)</p>	<p>AMC1 ADR.OR.D.005(b) (11) Management system point (c)(2)(vi)</p>	<p>AMC1 ATM/ANS.OR.B.005 (c) Management system</p> <p>COMPLIANCE MONITORING</p>	<p>GM1 ATCO.OR.C.001(f) 'Management system of training organisations' point (c)(2)(vi)</p>

5.2.4 Compliance monitoring outcomes e.g. audit results including corrective and preventive actions follow-up.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
<p>The organisation has documented procedures for the identification and follow-up of corrective actions and preventive actions.</p> <p>There is a process for how audit results are communicated to the accountable manager and senior management.</p> <p>The interface between compliance monitoring and the safety risk management processes is described.</p>		<p>The identifying and follow-up of corrective and preventive actions is carried out in accordance with the procedures including causal analysis to address root causes.</p> <p>The status of corrective and preventive actions is regularly communicated to relevant senior management and staff.</p>	<p>The organisation regularly reviews the status of corrective and preventive actions.</p> <p>The organisation investigates the systemic causes and contributing factors of findings.</p> <p>Significant findings are used in internal safety training & safety promotion sessions.</p> <p>The audit results and root causes, causal and contributing factors are analysed and considered when reviewing internal policies and procedures.</p> <p>There is regular communication between compliance monitoring staff and staff involved in other SMS activities.</p>	
Verification Examples				
<ul style="list-style-type: none"> As there are no compliance monitoring activities, there is currently no follow up. 				
Conclusion				
<p>Not applicable and not included in overall assessment scoring. An internal check of compliance against the ISMS Manual is currently not in place.</p>				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(6)	ORA.GEN.200 'Management system' point (a)(6)	AMC1 ADR.OR.D.005(b) (11) 'Management system' point (a)(1) points (b) and (e)	AMC1 ATM/ANS.OR.B.005(c) Management system COMPLIANCE MONITORING	ATCO.OR.C.001 'Management system of training organisations' point (f)

D. Recommendations

As concluded in the Executive Summary and indicated by the performance indicators, Schiphol ISMS has an OPERATING management system for controlling operational risk. Recommendations were outside of the scope of this assessment. In our experience, to achieve lasting success, a safety improvement plan should follow the Understand, Build, Power-up, Perform model, with this report being the foundation of the Understand phase; it is notable that much of the Build phase is already the subject of improvement plans.



Figure 6: Implementation Phases



Baines Simmons Limited
Aviation Safety Centre
Building A5 Fair Oaks Airport
Chobham
Surrey GU24 8HU
United Kingdom

Tel: +44 (0)1276 855 412
Fax: +44 (0)1276 856 285

www.bainessimmons.com